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5 IN THE UNITED STATES DISTRICT COURT  
6 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
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8 IN RE: UBER TECHNOLOGIES, INC.,  
9 PASSENGER SEXUAL ASSAULT  
10 LITIGATION

11 This Document Relates to:

12 *Jaylynn Dean v. Uber Techs., Inc.*,  
13 N.D. Cal. No. 23-cv-06708  
14 D. Ariz. No. 25-cv-4276  
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Case No. 23-md-03084-CRB

**DECLARATION OF ROOPAL P.  
LUHANA, ESQ. IN SUPPORT OF  
PLAINTIFF'S MOTIONS IN LIMINE**

Judge: Honorable Charles R. Breyer

1 I, Roopal P. Luhana, hereby declare as follows:

2 1. I am a partner of Chaffin Luhana LLP, an attorney licensed in the State of New  
3 York and duly admitted to practice before this Court, representing Plaintiffs in the above captioned  
4 action.

5 2. I submit this declaration in support of Plaintiff's Motions in Limine.

6 3. Defendants produced, for the first time, documents related to supposed support  
7 abuse allegations concerning "Jennifer" only after the applicable 30(b)(6) deposition concerning  
8 this topic. Defendants document production on this issue spanned a few week timeframe.  
9 Defendants did not produce fulsome records related to "Jennifer's" approximately three years on  
10 the Uber platform.

11 4. Defendants produced a spreadsheet listing training courses purportedly sent to  
12 driver Hassan Turay on December 3, 2025.

13 5. Defendants' most recent privilege log, produced to Plaintiffs on December 10,  
14 2025, contains approximately 110,298 entries.

15 6. Approximately 3,715 entries on Defendants' privilege log contain the phrase  
16 "cameras or recording devices in vehicles," and approximately 775 entries relate to S-RAD or Safe  
17 Dispatch.

18 7. Attached hereto as Exhibit 1 is a true and correct copy of the ruling issued by Judge  
19 Schulman on August 29, 2025 *In Re Uber Rideshare Cases*, JCCP, Superior Court, Case No. CJC-  
20 21-005188.

21 8. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of the deposition  
22 of Jaylnn Dean, dated June 27, 2025.

23 9. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of the deposition  
24 of Natasha Ramos, dated June 26, 2025.

25 10. Attached hereto as Exhibit 4 is a true and correct copy of the excerpts of the  
26 deposition of Olajuwon Ramos, dated June 26, 2025.

27 11. Attached hereto as Exhibit 5 is a true and correct copy of excerpts of the deposition  
28 of Gregory Brown, dated August 26, 2025.

1           12. Attached hereto as Exhibit 6 is a true and correct copy of the Rebuttal Expert Report  
2 of Vida Thomas.

3           13. Attached hereto as Exhibit 7 is a true and correct copy of the document produced  
4 as bates no. UBER\_JCCP\_MDL\_003348796.

5           14. Attached hereto as Exhibit 8 is a true and correct copy of excerpts of the deposition  
6 of Gregory Brown, dated July 15, 2025.

7           15. Attached hereto as Exhibit 9 is a true and correct copy of Tab 3 to Exhibit 1831 of  
8 the deposition of Jamie Brown, marked on August 26, 2025.

9           16. Attached hereto as Exhibit 10 is a true and correct copy of Plaintiff Jaylynn Dean's  
10 First Requests for Production propounded on Uber, dated March 26, 2025.

11           17. Attached hereto as Exhibit 11 is a true and correct copy of Plaintiffs' First Requests  
12 for Production propounded on Uber, dated February 28, 2024.

13           18. Attached hereto as Exhibit 12 is a true and correct copy of the 30(b)(6) deposition  
14 notice for witness Gregory Brown, dated July 9, 2025.

15           19. Attached hereto as Exhibit 13 is a true and correct copy of excerpts of the trial  
16 transcript in re *Henry v. Brenntag N. Am., Inc., et al.*, No. MID-1784-17 (N.J. Super. Ct. Law Div.  
17 Middlesex Cnty. Oct. 10, 2018).

18           20. Attached hereto as Exhibit 14 is a true and correct copy of excerpts of the trial  
19 transcript in re *Cadagin v. Johnson & Johnson*, No. 1522-CC00419-02 (Mo. Cir. Ct. City of St.  
20 Louis July 13, 2021)

21           21. Attached hereto as Exhibit 15 is a true and correct copy Uber's Responses and  
22 Objections to Plaintiffs' Third Set of Interrogatories.

23           22. Attached hereto as Exhibit 16 is a true and correct copy of Uber's Responses and  
24 Objections to Plaintiffs' Third Requests for Production.

25           23. Attached hereto as Exhibit 17 is a true and correct copy excerpts of the deposition  
26 of Henry (Gus) Fuldner, dated April 29, 2025.

27           24. Attached hereto as Exhibit 18 is a true and correct copy of excerpts of the deposition  
28

1 of Sachin Kansal, dated May 28, 2025.

2 25. Attached hereto as Exhibit 19 is a true and correct copy of excerpts of the deposition  
3 of Meghan Joyce, dated February 26, 2025.

4 26. Attached hereto as Exhibit 20 is a true and correct copy of privilege determinations  
5 issued by Special Master Barbara Jones on March 17, 2025.

6 27. Attached hereto as Exhibit 21 is a true and correct copy of privilege determinations  
7 issued by Special Master Barbara Jones on April 2, 2025.

8 28. Attached hereto as Exhibit 22 is a true and correct copy of privilege determinations  
9 issued by Special Master Barbara Jones on November 11, 2025.

10 29. Attached hereto as Exhibit 23 is a true and correct copy of privilege determinations  
11 issued by Special Master Barbara Jones on December 4, 2025.

12 30. Attached hereto as Exhibit 24 is a compendium of documents produced as bates  
13 nos. UBER\_JCCP\_MDL\_005239726, UBER\_JCCP\_MDL\_005354493, and  
14 UBER\_JCCP\_MDL\_003272500.

15 31. Attached hereto as Exhibit 25 is a true and correct copy of excerpts of the deposition  
16 of Mariana Esteves, dated August 28, 2025.

17 32. Attached hereto as Exhibit 26 is a true and correct copy of excerpts of the deposition  
18 of Hannah Nilles, dated July 23, 2025.

19 33. Attached hereto as Exhibit 27 is a true and correct copy of excerpts of the deposition  
20 of Andi Pimentel, dated March 27, 2025.

21 34. Attached hereto as Exhibit 28 is a true and correct copy of excerpts of the first  
22 bellwether trial transcript, *In Re Uber Rideshare Cases*, JCCP, Superior Court, Case No. CJC-21-  
23 005188.

24 35. Attached hereto as Exhibit 29 is a true and correct copy of the document produced  
25 as bates no. UBER\_JCCP\_MDL\_000911254.

26 36. Attached hereto as Exhibit 30 is a true and correct copy of Exhibit 2041 to the  
27 deposition of Emilie Boman, entered on October 1, 2025.  
28

1           37. Attached hereto as Exhibit 31 is a true and correct copy of excerpts of the deposition  
2 of Emilie Boman, dated October 1, 2025.

3           38. Attached hereto as Exhibit 32 is a true and correct copy of the document produced  
4 as bates no. UBER000231789.

5           39. Attached hereto as Exhibit 33 is a true and correct copy of excerpts of the deposition  
6 of Michael Akamine, dated May 20, 2025.

7           40. Attached hereto as Exhibit 34 is a true and correct copy of excerpts of the deposition  
8 of Kate Parker, dated February 14, 2025.

9           41. Attached hereto as Exhibit 35 is a true and correct copy of excerpts of the deposition  
10 of Sunny Wong, dated April 16, 2025.

11           42. Attached hereto as Exhibit 36 is a true and correct copy of excerpts of the deposition  
12 of Rebecca Payne, dated April 2, 2025.

13           43. Attached hereto as Exhibit 37 is a true and correct copy of excerpts of the deposition  
14 of Katherine McDonald, dated April 24, 2025.

15           44. Attached hereto as Exhibit 38 is a true and correct copy of the document produced  
16 as bates no. UBER\_JCCP\_MDL\_001687315.

17           45. Attached hereto as Exhibit 39 is a true and correct copy of excerpts of the deposition  
18 of Hannah Nilles, dated May 29, 2025.

19           46. Attached hereto as Exhibit 40 is a true and correct copy of excerpts of the deposition  
20 of Hannah Nilles, dated June 30, 2025.

21           47. Attached hereto as Exhibit 41 is a true and correct copy of excerpts of the deposition  
22 of Roger Kaiser, dated November 19, 2024.

23           48. Attached hereto as Exhibit 42 is a true and correct copy of excerpts of the deposition  
24 of Todd Gaddis, dated July 8, 2025.

25           49. Attached hereto as Exhibit 43 is a true and correct copy the ruling issued by Judge  
26 Jeffrey S. Ross on September 12, 2025, *In re Lyft Rideshare Cases*, JCCP, Superior Court, Case  
27 No. CJC-20-005061.  
28

1           50. Attached hereto as Exhibit 44 is a true and correct copy excerpts of the deposition  
2 of Nairi Hourdajian, dated February 7, 2025.

3           51. Attached hereto as Exhibit 45 is a true and correct copy of the document produced  
4 as bates no. UBER\_JCCP\_MDL\_004910959.

5           52. Attached hereto as Exhibit 46 is a true and correct copy of excerpts of the deposition  
6 of Heather Childs, dated June 5, 2025.

7           53. Attached hereto as Exhibit 47 is a true and correct copy of excerpts of the deposition  
8 of Troy Stevenson, dated October 21, 2024.

9           54. Attached hereto as Exhibit 48 is a true and correct copy of the document produced  
10 as bates no. UBER\_JCCP\_MDL\_004842329.

11           55. Attached hereto as Exhibit 49 is a true and correct copy of the document produced  
12 as bates no. UBER\_JCCP\_MDL\_004647390.

13           56. Attached hereto as Exhibit 50 is a true and correct copy of the document produced  
14 as bates no. UBER\_JCCP\_MDL\_005549945.

15           57. Attached hereto as Exhibit 51 is a true and correct copy of the document produced  
16 as bates no. UBER\_JCCP\_MDL\_000562747.

17           58. Attached hereto as Exhibit 52 is a true and correct copy of the document produced  
18 as bates no. UBER\_JCCP\_MDL\_001636569.

19           59. Attached hereto as Exhibit 53 is a true and correct copy the document produced as  
20 bates no. UBER\_JCCP\_MDL\_005207782.

21           60. Attached hereto as Exhibit 54 is a true and correct copy of the document produced  
22 as bates no. UBER\_JCCP\_MDL\_005207788.

23           61. Attached hereto as Exhibit 55 is a true and correct copy of the document produced  
24 as bates no. QS\_0000055.

25           62. Attached hereto as Exhibit 56 is a true and correct copy of the document produced  
26 as bates no. UBER\_JCCP\_MDL\_005154815.

27           63. Attached hereto as Exhibit 57 is a true and correct copy of the document produced  
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1 as bates no. UBER\_JCCP\_MDL\_003255312.

2 64. Attached hereto as Exhibit 58 is a true and correct copy of the document produced  
3 as bates no. UBER\_JCCP\_MDL\_003359920.

4 65. Attached hereto as Exhibit 59 is a true and correct copy of the document produced  
5 as bates no. UBER\_JCCP\_MDL\_005579342.

6 66. Attached hereto as Exhibit 60 is a true and correct copy of the document produced  
7 as bates no. UBER\_JCCP\_MDL\_002658984.

8 Executed this 16<sup>th</sup> day of December, 2025 in Pittsburgh, Pennsylvania.

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10 /s/ Roopal P. Luhana

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